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16 APPLE INC.

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20 UNITED STATES DISTRICT COURT
21
22 NORTHERN DISTRICT OF CALIFORNIA

23
24 ZENTIAN LTD.,

25 Plaintiff,

26 v.

27 APPLE INC.,

28 Defendant.

Case No. 23-cv-02921-TLT

Hon. Trina L. Thompson

**STIPULATION AND
[PROPOSED] ORDER TO STAY
CASE**

1 Plaintiff Zentian Ltd. and Defendant Apple Inc. hereby stipulate and request that the Court
 2 stay this action pending the completion of challenges at the Patent Trial and Appeal Board
 3 (“PTAB”) concerning U.S. Patent Nos. 7,587,319 (the “‘319 Patent”), 7,979,277 (the “‘277
 4 Patent”), 10,062,377 (the “‘377 Patent”), 10,839,789 (the “‘789 Patent”), and 10,971,140 (the
 5 “‘140 Patent”) (together, the “Asserted Patents”).

6 WHEREAS, Apple filed petitions for *inter partes* review (“IPR”) challenging the
 7 Asserted Patents as outlined in the below chart:

8	Case No.	Patent	Claims Challenged	Petitioner	Date Filed	Institution Decision
9	IPR2023-00033	‘319	46-51, 53, 54, 58, 59, 64, 67	Apple Inc.	12/02/2022	Instituted June 12, 2023
10	IPR2023-00034	‘277	1, 4, 5, 7, 9, 10, 12, 14-16	Apple Inc.	11/15/2022	Instituted June 12, 2023
11	IPR2023-00035	‘377	All	Apple Inc.	11/15/2022	Instituted June 12, 2023
12	IPR2023-00036	‘789	1, 2, 4, 6-14, 16-18, 20-29, 35, 37-39, 42-45	Apple Inc.	11/15/2022	Instituted June 12, 2023
13	IPR2023-00037	‘140	All	Apple Inc.	12/02/2022	Instituted June 12, 2023

17 WHEREAS, the parties agree that a stay of this action pending resolution of the now-
 18 instituted IPRs of the Asserted Patents filed by Apple would conserve both judicial and party
 19 resources;

21 WHEREAS, the parties agree that as part of the stay, all discovery will be paused,
 22 including all discovery between the parties and all third-party discovery;

23 IT IS HEREBY AGREED AND STIPULATED by and between the parties, through their
 24 respective counsel, subject to Court approval, THAT:

25 1. The case shall be immediately stayed subject to the Court’s approval of this
 26 stipulation. All dates and deadlines are stayed as of the filing of this stipulation.

27 2. The Parties shall file a joint status report within fourteen (14) days of issuance of
 28 the final written decisions in the proceedings listed above, with the parties’ positions on whether

the stay should be lifted. The stay shall remain in effect absent further order from this Court.

/s/ Katherine E. Rhoades

/s/ Roman A. Swoopes

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

Honorable Trina L. Thompson
United States District Judge

ECF ATTESTATION

I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories hereto.

Dated: 7/24/2023

/s/ Roman A. Swoopes
Roman A. Swoopes